## TOLL/USAGE BILL AUDIT

The TOLL/USAGE BILL AUDIT is performed to ensure that toll, and associated charges are correct on residence and business customer bills. The focus of the audit is to manually or mechanically review every toll service we provide to residence and business customers each billing period.
The Customer Information Data Base (CIDB) is utilized for the account selection. CIDB program is used to find accounts and provides information on which accounts have the requested services. Whenever possible, accounts with multiple items are tested to maximize efficiency. Once accounts are selected they are entered into a Preview Bill File. The Preview Bill File contains a copy of each selected account to be audited. The Preview Bill File is continually reviewed and additions or deletions made.

The purpose of the Bill Audit is to review and recalculate each service billed for each of the seven individual processing centers in the five states. Wholesale accounts are included in each processing center's verification every billing period. The discount table is used to ensure that the correct discount is applied.

Any discrepancies found must have root cause analysis done before bills are released to be mailed on the sixth workday of the billing period.

## CABS BILL AUDIT

CABS Bill Audit is performed to ensure that the CABS billing system process each billing function correctly. Bills are chosen based on different billing functions, and usage types. (Feature Groups). This includes each different Feature Group for Switched Access, Non-Switched Access & Special Access. Switched and Special Access both have UNEs included in their bill audit functions.

The Usage billing process is mechanically validated by our Production Code Test (PCT) process for most usage types, and we manually verify any other usage type not included in the PCT process. The PCT process includes processing from AMA through CABS billing using a test-bed of actual usage and creates billed data that is compared to expected result data. Root cause analysis is performed where the actual billing does not match the expected results.

Other Charges and Credits, (OC&C), generated by service order activity is reviewed daily prior to bills being created. During the Bill Audit process we verify that the amount expected for OC&C amount appears on the bill.

Late payment charges (LPC), Alternate Billing Media (ABM), surcharges and taxes are additional manual verifications performed on all types of services.

## NON-RECURRING CHARGE VALIDATION

SWBT utilizes the daily test order process to validate recurring and non-recurring charges for products and services billed via service orders. This process is embedded in the CRIS billing system programs and cycle flow and has been part of the CRIS program cycle for over twenty years.

Before any live service orders are processed by daily SWBT CRIS billing programs, a test order file is processed through the live service order rating programs. The test order file format is the same as live service orders, with the exception of 3 additional entries. These entries contain expected recurring, non-recurring and total charges from the order. There are 7 separate billing databases for SWBT, thus 7 separate test order files. Texas has 3 databases, with 1 database each for the other states. A total of 1469 test orders reside on these files with 219 being CLEC orders.

Each test order file is maintained by the rate table update groups located in Dallas in the Billing Operations organization. Personnel in the rate groups calculate the rates based on applicable tariffs, contracts or other approved rate documentation. Each file is a representative sample of a variety of activity for existing products and services billed by SWBT. Each file is modified on a regular basis to include new products, services and CLEC's, and any state specific changes.

The live service order rating programs calculate and apply rates to the test orders in the same way they rate live service orders. This encompasses using the same programs and file sources, including the CRIS rate tables and discount matrices for CLECs. When the programs have rated the test orders, a step in the program compares the program calculations to the 3 entries on each test order. Any difference causes the program to halt. Processing stops immediately. A data center manager contacts the appropriate Billing Operations manager to investigate the difference. The cycle is not allowed to continue until the difference is resolved.

## BILLING MEASUREMENTS

1. BILLING TIMELINESS
   - Daily usage feed - SWBT will provide a measurement that measures the length of time from message creation to when its made available to the CLEC or the percent of time SWBT transmits the usage feed daily..
   - Non-Recurring Charges (NRC)- No separate measurement will be provided since they are included in the wholesale bill.
   - Wholesale Bill - SWBT will provide a measurement on mechanized bills that are sent to the CLEC on time. The measurement will be % mechanized bills sent by midnight of the 6th work day after the end of the bill period. Since paper bills, diskettes and CD ROMs are sorted for both the CLEC and SWBT by zip code and mailed at the same time, then no measurement is necessary.

2. BILLING ACCURACY
   - Daily Usage Feed - SWBT will provide a measurement that measures the percent of billing records transmitted correctly on the usage extract feed. In addition a toll/usage audit is done each billing period to verify that toll and associated charges are correct.
   - Non-Recurring Charges - SWBT does a non-recurring charge validation by passing test orders to identify problems during the billing cycle (see description above). This process ensures the accuracy of non-recurring charges.
   - Wholesale Bill - SWBT performs an audit of selected bills as described above. Since this is the same billing system and audit process that is used in the retail operation, SWBT believes parity exists.. However, SWBT will provide on a monthly basis the results of the bill audit of CLEC accounts. Since the sample was designed to verify billing system functions, it can not be used to predict the percent of overall billing errors.

3. BILLING COMPLETENESS
   - Daily Usage Feed - The same process is used to collect the data for CLECs that is used for SWBT. SWBT will provide a measurement to capture the aggregate of SWBT and CLEC unbillable usage.
   - Non-Recurring Charges - Captured in wholesale bill measurement..

# ATTACHMENT 1
## 271 PERFORMANCE MEASUREMENTS

- Wholesale Bill - SWBT is developing a measurement that shows the percent of service orders billed on the first applicable bill period for both CRIS and CABS billing.

# ATTACHMENT 2
# 271 PERFORMANCE MEASUREMENTS

## DIRECTORY SERVICES

SWBT currently provides nondiscriminatory access to DA Services on behalf of entities other than its own end user customers that is equal in quality to the services that SWBT provides to its own customers. Calls from SWBT end users and end users of other carriers using SWBT DA Services are processed by the Operator Services system in the order they are received. When the OS switch detects a trunk seizure on a trunk carrying DA traffic, it searches for an idle operator position and, if one is available, connects the call to the position that has been idle the longest.. If no operator is available, the call is time stamped and placed in the Calls Waiting queue. When an operator position becomes available, the OS switch searches the Calls Waiting queue and connects the oldest call to the idle position.

## OPERATOR SERVICES

SWBT currently provides nondiscriminatory access to Operator Call Completion Services on behalf of entities other than its own end user customers that is equal in quality to the services that SWBT provides to its own customers. Calls from SWBT end users and end users of other carriers using SWBT Operator Call Completion Services are processed by the Operator Services system in the order they are received. When the OS switch detects a trunk seizure on a trunk carrying OS traffic, it searches for an idle operator position and, if one is available, connects the call to the position that has been idle the longest. If no operator is available, the call is time stamped and placed in the Calls Waiting queue. When an operator position becomes available, the OS switch searches the Calls Waiting queue and connects the oldest call to the idle position.

## BRANDING

SWBT will provide branding with the CLEC's name for Operator Services and DA calls for both resellers and facility based providers.

SWBT is capable of branding calls for a facility based CLEC that establishes a separate trunk group to the SWBT Operator Services switch. Branding is available in this case because the calls are handled first by the contracting carrier's switch, aggregated, and then delivered to SWBT's Operator switch over separate, dedicated trunk groups. These dedicated trunk groups allow

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the SWBT switch and operator to identify the call and the CLEC and brand appropriately. With a separate trunk group, SWBT will brand all calls with the CLEC's name.

SWBT ordered, purchased, and installed upgrades to its Operator Services switches to make branding capability available to resellers. This feature is now available. Provisions for branding are included in SWBT's OCC approved inter-connection agreements. SWBT has implemented branding for 18 resellers in the five-state area. The installation of this feature gives SWBT the capability in all situations to brand Operator Services and Directory Assistance calls with the name of the carrier.

# ATTACHMENT 3
# 271 PERFORMANCE MEASUREMENTS

## INTERCONNECTION TRUNKS

In 1990, the Exchange Carriers Standards Association Committee T1 established blocking levels associated with end office to tandem common transport trunk groups and end office or tandem to IXC POP trunk groups. It was agreed that the overall blocking objective between the end office serving an IXC customer and the IXC POP was 1%. If the connection was routed through the tandem, the common transport trunk group would be engineered to .5% blockage and the tandem to POP would be engineered to .5% blockage for an overall blockage of 1%. In 1993, in response to concerns from the IXCs, SWBT changed its policy to engineer common transport trunk groups from its end offices to its tandems to .25% blockage.

> IXC POP ----.5% ---- SWBT Tandem ----.25% ---- SWBT End Office

As part of its proposed CLEC contractual agreements, SWBT's proposed language in the Interconnection Trunking Appendix incorporates an overall blocking objective of 2% for calls between a SWBT customer and a CLEC customer. That would be 1% blockage on end office to tandem common transport trunk groups and 1% blockage on tandem to CLEC common transport trunk groups. However, since calls to the CLEC via the tandem are transported over the same common transport trunk group as described above, the blocking objective would be .25% for the common transport trunk group.

The trunk groups between SWBT end offices are designed for 2% blocking.

> CLEC End Office --- 1% --- SWBT Tandem --- .25% --- SWBT End Office

> SWBT End Office ----------------- 2% -------------------- SWBT End Office

Thus, CLEC calls routed to the SWBT end offices via the tandem are designed to experience only 1.25% blockage, while calls routed directly between SWBT end offices can experience 2% blockage.

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SWBT interconnects with CLEC switches using one way or two way trunks. For one way trunks, SWBT typically has "control" over the outgoing trunk group from its switch and the CLEC has control for those groups incoming to SWBT switches. For two way groups, the CLEC and SWBT have joint responsibility for provisioning the trunk group. For those groups over which SWBT has "control", comparative measurements are provided for SWBT trunk groups with analogous blocking design criteria. For those groups over which the CLEC has sole or joint "control", no comparative measurements for percent blocking are provided.

## COMMON TRANSPORT TRUNK MEASUREMENTS

SWBT will report, for local common transport, the total reportable trunk groups, the number of trunks groups over threshold for 1 month and the percent over threshold for 1 month by market area. In addition, for those groups over threshold, SWBT will provide a distribution of the trunk groups by blocking percentage. For example, if the Dallas market area had 7 trunk groups over threshold with blocking percentages of 2.65, 3.35, 3.97, 4.23. 6.25, 6.97 and 10.25. the report would show the following:

| 2% - 3% | 3% - 4% | 4% -5% | 6% - 7% | > 10% |
|---------|---------|--------|---------|-------|
| 1 | 2 | 1 | 2 | 1 |

If a CLEC's customers were experiencing a problem indicative of a trunk blockage condition, SWBT would do root cause analysis to determine if a trunk blockage condition exists. If such a condition exists, SWBT would provide to the CLEC, upon request, the specific trunk group causing the condition as well as the planned action to alleviate the blocking condition.

## 911 DATABASE

The 911 database update process ensures that both the CLEC's updates are handled in parity with SWBT's updates. For pure resellers, updates are provided within 24 hours of the SORD file updates, just exactly as SWBT 9-1-1 updates are provided. Facility based providers use the PS911 approach that provides instant updates to the FR/DBMS (the 911 data management system) and immediate feedback via a statistical report of records processed on the file and errors that occurred. A separate error file is also immediately available. The Automatic Location Identification (ALI ) data base, the data base that sends the address information to the Public Safety Answering Point (PSAP), is updated 5 times a day in the Missouri , Oklahoma, Kansas and Arkansas (MOKA) region, and 6 times a day in Texas. The updates are not instantaneous, but are made within a 24 hour period. The updates, process all changes since the last ALI update process was executed without regard to record ownership. In other words, SWBT and CLEC records update the ALI system at the same time via the ALI updates. The selective routers are updated 2 to 4 times a day in Texas (depending on the region, i.e. Houston router gets updated 4 times, Dallas get updated 2 times). The selective routers are updated once a day in the MOKA region. Based on clean input (no errors) the records would update the selective routers and the ALI data base within 24 hours of receipt of the update file.

Errors resulting from this process in the 9-1-1 Database Management System are handled by the SWB 9-1-1 Data Integrity Unit (DIU). Errors are received when the file has completed processing. Employees in the DIU are responsible for investigating each error and resolving it.

The DIU employee cannot determine if an account is a Resold Account until he/she begins investigation of the error. Only when the account is accessed in the SWB CRIS or SORD system can they determine it is Resold. SWB does not have access to the billing system of the CLEC and therefore cannot continue the investigation process. Procedures have been agreed upon between the DIU and the LSC, that when it is necessary to contact the CLEC to get additional information to clear an error, the DIU calls the LSC and refers the error.

The LSC then contacts the CLEC to get the necessary information to correct the record so it can post to the 9-1-1 Database. The LSC is responsible for issuing a correcting order that flows to 9-1-1 and post. The LSC then notifies the DIU of the disposition.

The DIU then follows-up to be sure the correcting order posts and at that time deletes the original error. If the error can be corrected without an order being issued, this information is given to the DIU and the error is manually corrected.

## 911 DATABASE MEASUREMENTS

Currently, SWBT is not able to mechanically measure the length of time it takes to clear an error once it is created in the system. SWBT strives to meet the Recommended Standards set by the National Emergency Number Association (NENA) and recently standards were produced with regard to Data Accuracy. This is one of the measurements NENA recommends. SWB is currently working with Lucent Technology to develop the requirements for this enhancement and will implement this measurement when it becomes available.

A Southwestern Bell Telephone (SWBT) local exchange customer with individual line business service in Dallas, Texas pays a basic service rate of $25.25 per month. If that customer dials an Information Service Provider (ISP) connected behind a Competitive Local Exchange Company (CLEC) and maintains the connection during the entire month, SWBT would inappropriately be required to pay the CLEC $388.80 (24 hours x 60 minutes per hour x 30 days x $.009 terminating compensation) reciprocal compensation. Consequently, SWBT would lose $363.55 in the provision of service to that customer. Even if the customer only uses ISP access for slightly less than 2 hours per day, SWBT's $25.25 monthly rate is wiped out and SWBT would receive no revenue for its cost of providing local service.

**Dallas Local (Exchange) Calling Area**

Interexchange
Interstate
International

Interconnection Facility

SWBT Business Customer

| Customer Pays SWBT $25.25 per Month for Basic Business Service | Customer Uses ISP Service on a Continuous Basis for the Entire Month ( 43,200 Minutes) | SWBT Sends the Customer's ISP Usage to the CLEC for Termination to the ISP and Pays the CLEC $.009 per Minute |
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